

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND**  
(Northern Division)

JAWONE D. NICHOLSON,

\*

Plaintiff

\*

v.

\*

Civil Action No.: 1:20-cv-03146

STATE OF MARYLAND, *et al.*

\*

Defendant

\*

\* \* \* \* \*

**JOINT MOTION TO AMEND SCHEDULING ORDER**

Defendant Officer Damond T. Durant (“Defendant”) and Plaintiff Jawone Nicholson (“Plaintiff”; hereinafter collectively referred to as the “Parties”), by and through undersigned counsel and pursuant to Fed. R. Civ. P. 6(b), 16(b)(4), and this Court’s Local Rule 105(9), hereby file this Joint Motion to Amend Scheduling Order (the “Motion”) and, in support thereof, state as follows:

1. The Parties jointly make the requests stated herein.
2. Continuing discovery revealed the existence of numerous, previously unknown fact witnesses the Parties are contemplating deposing.
3. To ensure the Parties have ample time to thoroughly and diligently conduct discovery, the Parties jointly agree and, and hereby respectfully request, that this Court amend the current Scheduling Order, thereby granting an additional sixty (60) days with, which to conduct discovery.
4. The Parties further jointly and respectfully request that all other dates falling after the discovery deadline be extended by the same amount, yielding a new schedule, as follows:

Filing/Occurrence	Current Deadline	Proposed Deadline
Discovery Deadline; Status Report	August 30, 2022	October 31, 2022
Rule 26(e)(2) Supplementation	August 30, 2022	October 31, 2022
Requests for Admission	September 7, 2022	November 7, 2022
Dispositive Pretrial Motions	October 7, 2022	December 6, 2022

5. This motion is not filed for any improper purpose or undue delay.

6. The Parties will not be prejudiced should this Court grant this Motion.

**WHEREFORE**, for good cause shown, the Parties hereby jointly and respectfully request that this Court enter the accompanying Order amending this Court's Scheduling Order.

Respectfully submitted,

/s/ Stuart R. Goldberg

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*Counsel for Plaintiff Jawone Nicholson*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on this 17th day of August 2022, Defendant filed a copy of the foregoing Joint Motion to Amend Scheduling Order in the United States District Court for the District of Maryland, and served the same on all counsel of record, electronically, via the Court's CM/ECF e-filing system.

/s/ Stuart R. Goldberg  
Stuart R. Goldberg, Federal Bar #21236

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\*   \*   \*   \*   \*   \*   \*   \*   \*   \*   \*   \*

**ORDER**

Upon consideration of the Parties' Joint Motion to Amend Scheduling Order, it is hereby:

**ORDERED**, that the Parties' Joint Motion to Amend Scheduling Order is **GRANTED**;

and it is further

**ORDERED**, that this Order shall memorialize the **AMENDED** dates and deadlines from this Court's Scheduling Order, as follows:

Filing/Occurrence	Current Deadline	Proposed Deadline
Discovery Deadline; Status Report	August 30, 2022	October 31, 2022
Rule 26(e)(2) Supplementation	August 30, 2022	October 31, 2022
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Dated: \_\_\_\_\_

\_\_\_\_\_  
United States District Judge